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Attorneys for Wilmington Trust, National Association

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re

CALIFORNIA-NEVADA METHODIST
HOMES,

Debtor.

Case No.: 21-40363

CHAPTER 11

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE**

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that McDermott Will & Emery LLP hereby enters its appearance (this “Notice”) in the above-captioned chapter 11 case as counsel to Wilmington Trust, National Association (“Wilmington”) and requests that any and all notices and pleadings given or required to be given in the above-captioned chapter 11 case, and any and all papers served or required to be served in the above-captioned chapter 11 case, be given and served upon the following:

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1 **PLEASE TAKE FURTHER NOTICE** that this Notice encompasses all notices, copies
2 and pleadings referred to in section 1109(b) of title 11 of the United States Code and in Rules 2002,
3 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, including, without limitation,
4 notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization,
5 disclosure statements, requests, or applications, and any other documents brought before this Court
6 in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail,
7 delivery, telephone, telex, or otherwise, which affect or seek to affect the above case.

8 **PLEASE TAKE FURTHER NOTICE** that neither this Notice nor any prior or later
9 appearance shall be deemed or construed to be a waiver of any substantive or procedural rights of
10 Wilmington including, without limitation: (i) the right to have final orders in noncore matters
11 entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any
12 proceedings so triable in this case or in any case, controversy, or proceeding related to this case;
13 (iii) the right to have a district court judge withdraw the reference in any matter subject to
14 mandatory or discretionary withdrawal; (iv) an election of remedies; or (v) any other rights, claims,
15 actions, defenses, setoffs, or recoupments to which Wilmington is or may be entitled, in law, in
16 equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are
17 expressly reserved. Unless and until Wilmington expressly states otherwise, Wilmington does not
18 consent to the entry of final orders or judgments by this Court if it is determined that this Court,
19 absent consent of the parties, cannot enter final orders or judgments consistent with Article III of
20 the United States Constitution.

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Dated: April 13, 2021

By: /s/ Natalie Rowles
Kristin K. Going (admitted *pro hac vice*)
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*Attorneys for Wilmington Trust, National
Association*

CERTIFICATE OF SERVICE

I certify that on April 13, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of California.

/s/ Natalie Rowles

Natalie Rowles